

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No.
	)	
VARIOUS PARCELS OF REAL	)	
PROPERTY, VARIOUS VEHICLES,	)	
AND JEWELRY,	)	
	)	
Defendants.	)	

**VERIFIED COMPLAINT IN FORFEITURE**

AND NOW comes the United States of America by and through its counsel, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Mary McKeen Houghton, Assistant United States Attorney for the Western District of Pennsylvania, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of various parcels of real estate, including all of the improvements, fixtures and appurtenances thereto and therein, various vehicles and jewelry on Exhibit A attached hereto and incorporated herein (collectively called the "Defendant Property") pursuant to 21 U.S.C. § 881(a)(6).

2. Jurisdiction is predicated upon 28 U.S.C. §§ 1345 and 1355. Venue is proper under 28 U.S.C. §§ 1395 and 1355.

3. The Drug Enforcement Administration has been involved in an investigation of Troy David Brown (Brown) and others for the illegal distribution of cocaine in violation of 21 U.S.C. §§ 841 and 846.

4. The Defendant Property is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6) since it constitutes, or is traceable to, the illegal proceeds generated by Brown and others through their unlawful distribution of cocaine in violation of 21 U.S.C. §§ 841 and 846.

5. The criminal investigation against Brown and others has revealed that during the period from at least January 2005 and continuing through April 3, 2007, Brown and others unlawfully sold and distributed cocaine in the Western District of Pennsylvania and elsewhere and generated over a million dollars of illegal drug proceeds.

6. The Defendant Property constitutes, or is traceable to, the illegal proceeds generated by Brown and others through their unlawful distribution of cocaine in violation of 21 U.S.C. §§ 841 and 846.

7. Based upon the foregoing, the Defendant Property is forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

WHEREFORE, the United States of America respectfully requests that process of warrant *in rem* issue for the arrest of the Defendant Property; that judgment of forfeiture be entered in favor of the United States for the Defendant Property; and that the United States be granted such relief as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

By: s/ MARY MCKEEN HOUGHTON  
Assistant U.S. Attorney  
Suite 4000, U.S. Courthouse  
Pittsburgh, PA 15219  
(412) 894-7370  
PA ID 31929

EXHIBIT A

Parcel I.D. 0301-E-00144-0000-00 521 Stokes Avenue, Braddock, PA 15104

Parcel I.D. 0301-K-00238-0000-00 569 Stokes Avenue, Braddock, PA 15104

Parcel I.D. 0302-B-00332-0000-00 1006 Kirkpatrick Street, Braddock, PA 15104

Parcel I.D. 0302-B-00332-0001-00 Kirkpatrick Street, Braddock, PA 15104

Parcel I.D. 0375-B-00127-0000-00 1522 Brinton Avenue, Braddock, PA 15104

Map No. 57-14-00-0-380-00-000 Lot 11, Steele-Hohman Plan No. 4, Salem Twp, PA

2000 Ford Truck, VIN 1FDWF36L7YEC10312

2002 GMC Yukon, VIN 1GKFK66U12J263858

2005 GMC Truck, VIN 2GTEK13T051115897

2005 Worthington Trailer, VIN 4MVFU162657012159

2000 Big-Tex Trailer, VIN 4K8AX1216Y1A61593

1989 Ford Dump Truck, VIN 2FDLF47M7KCB34751

A gold pendant with diamonds


VERIFICATION

I am a Special Agent of the Drug Enforcement Administration, and the case agent assigned to this forfeiture action.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 30<sup>th</sup> day of April, 2007.

  
Scott Smith, Special Agent  
Drug Enforcement Administration